

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

UNITED STATES POSTAL SERVICE  
INTERROGATORY AND REQUEST FOR PRODUCTION OF DOCUMENTS TO  
UNITED PARCEL SERVICE WITNESS SELICK  
(USPS/UPS-T2-2)

Pursuant to rules 25 through 27 of the Rules of Practice and procedure, the United States Postal Service directs the following interrogatory and request for production of documents to United Parcel Service witness Sellick: USPS/UPS-T2-2.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Susan M. Duchek

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June 19, 2000

USPS/UPS-T2-2. Please refer to your testimony, UPS-T-2, at page 5, lines 2-6. You state, "The 'migration' of some costs previously defined as Window Service (and assigned to Cost Segment 3.2) and Administrative (and assigned to Cost Segment 3.3) should be reversed to ensure treatment consistent with the Commission's established practice." Please also refer to your Docket No. R97-1 response to USPS/UPS-T2-17 (Docket No. R97-1, Tr. 26/14222), where you stated that you "have not testified that the existing [pre-Docket No. R97-1] method for distributing administrative costs is more accurate than witness Degen's proposed methodology."

- a. Please explain whether it is still the case that, as you stated in Docket No. R97-1, your current testimony, UPS-T-2, does not indicate "that the existing [pre-Docket No. R97-1] method for distributing administrative costs is more accurate than witness Degen's proposed methodology."
- b. If your response to part (a) indicates that you now believe that there is a reason (or reasons) to reverse the "migration" of costs, other than "to ensure treatment consistent with the Commission's established practice," please state and describe fully each reason, and provide all related data and/or analysis that supports your position.

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in black ink, appearing to read "Susan M. Duchek", is written over a horizontal line.

Susan M. Duchek

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